

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ERICA FRASCO, et al.,

Plaintiffs,

v.

FLO HEALTH, INC., et al.,

Defendants.

Case No. 21-cv-00757-JD

**PROPOSED VOIR DIRE**

The Court will ask these in-court voir dire questions at the July 21, 2025 jury selection, which are in addition to the written juror questionnaire responses. The in-court questions are based on the parties' submissions, Dkt. No. 654, and the Court's practice.

The parties are directed to bring on July 21, 2025, an updated, joint list of witnesses to be used for voir dire. Any objections or concerns to the proposed voir dire will be taken up the morning of July 21, 2025, before the prospective jurors are brought into the courtroom.

**IT IS SO ORDERED.**

Dated: July 17, 2025

  
\_\_\_\_\_  
JAMES DONATO  
United States District Judge



**VOIR DIRE QUESTIONS**

1. Counsel for plaintiffs will introduce themselves and their clients.
  - a. Do you know any of the attorneys?
  - b. Do you know any of the plaintiffs?
2. Counsel for defendants will introduce themselves and their clients.
  - a. Do you know any of the attorneys?
  - b. Are you personally acquainted with an officer, director, or employee of Flo Health, Inc.?
  - c. Have you or anyone close to you had any financial dealings with Flo Health, Inc., including stock ownership or investment?
  - d. Are you personally acquainted with an officer, director, or employee of Meta Platforms, Inc.?
  - e. Have you or anyone close to you had any financial dealings with Meta Platforms, Inc., including stock ownership or investment?
3. Here is a list of potential witnesses who may testify at trial. Do you know any of these people?
4. Have you or anyone close to you ever worked for a tech or social media company?
5. Do you or anyone close to you have experience, education, or training in data privacy or protection?
6. Have you or anyone close to you been involved in a dispute about data privacy or protection?
7. Have you or anyone close to you ever worked for an app company?
8. Have you or anyone close to you ever used the Flo Period & Ovulation Tracker app?
9. Do you have any difficulty understanding English, or reading documents in English?
10. Have you read or heard anything about this case other than what you've heard here today?
11. Is there anything I have not asked you about you that you believe could affect your ability to serve as a fair and impartial juror for this trial?